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10 Attorney for Defendant  
11 RAGINI VECHAM

12 UNITED STATES DISTRICT COURT  
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14 NORTHERN DISTRICT OF CALIFORNIA  
15  
16 SAN JOSE DIVISION

17 UNITED STATES OF AMERICA,  
18  
19 Plaintiff,  
20  
21 v.  
22 RAGINI VECHAM,  
23  
24 Defendant.

CASE NO. CR-15-0427 BLF (HRL)

**STIPULATION AND [PROPOSED]  
ORDER MODIFYING DEFENDANT  
RAGINI VECHAM'S CONDITIONS OF  
RELEASE TO PERMIT TRAVEL OUT  
OF DISTRICT FROM JUNE 5 THROUGH  
JUNE 22, 2016, AND JUNE 28 THROUGH  
JULY 15, 2016**

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27 **STIPULATION**

28 Defendant Ragini Vecham has been on pretrial release since her initial appearance before the magistrate court in September 2015. It is a condition of her pretrial release that Ms. Vecham not travel outside the Northern District of California without the permission of the Court.

Ms. Vecham wishes to travel with her children to visit family in Reno, Nevada from June 5, 2016 through June 22, 2016. She also wishes to travel with her children and other members of her extended family (not including co-defendant Kishore Pallapothu) to New York, New Jersey, Washington, D.C., and Vermont from June 28, 2016 through July 15, 2016.

The government does not object to the modification of Ms. Vecham's release conditions to accommodate this travel. Pretrial Services likewise does not object, provided that Ms. Vecham

1 gives Pretrial Services all requested information concerning her travel and lodging plans in  
2 advance of her departure.

3 Accordingly, the parties agree and stipulate that Ms. Vecham's conditions of release  
4 should be modified to permit Ms. Vecham to travel to Reno, Nevada from June 5, 2016 through  
5 June 22, 2016; and to New York, New Jersey, Washington, D.C., and Vermont from June 28,  
6 2016 through July 15, 2016.

7 IT IS SO STIPULATED.

8  
9 DATED: May 26, 2016

\_\_\_\_\_/s/\_\_\_\_\_  
JOSH COHEN  
Attorney for MADHU SANTHANAM

10  
11 DATED: May 26, 2016

\_\_\_\_\_/s/\_\_\_\_\_  
TIMOTHY J. LUCEY  
Assistant United States Attorney

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15 **ORDER**

16 By stipulation of the parties, and for good cause shown, it is hereby ordered that defendant  
17 Ragini Vecham's conditions of release shall be modified as follows: Ms. Vecham shall be  
18 permitted to travel from the Northern District of California to Reno, Nevada from June 5, 2016 to  
19 June 22, 2016. Ms. Vecham shall also be permitted to travel from the Northern District of  
20 California to New York, New Jersey, Washington, D.C., and Vermont from June 28, 2016 through  
21 July 15, 2016. Ms. Vecham shall provide Pretrial Services with travel and lodging information as  
22 directed by Pretrial Services. All other conditions of release shall remain in effect.

23 IT IS SO ORDERED.

24 DATED: \_\_\_\_\_

\_\_\_\_\_  
HOWARD R. LLOYD  
UNITED STATES MAGISTRATE JUDGE